

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

Mar 12, 2020

Kathy A. Surraatt - States
KATHY A. SURRATT-STATES
Chief United States Bankruptcy Judge

In re:) Chapter 11
)
FORESIGHT ENERGY LP, et al.,) Case No. 20-41308-659
)
Debtors.1) (Joint Administration Requested)

VERIFIED MOTION FOR ADMISSION PRO HAC VICE

Pursuant to LR 2090(B)(1) of the United States Bankruptcy Court for the Eastern District of Missouri, and Rule 12.01(F) of the local rules of the United States District Court for the Eastern District of Missouri, I, Wendi Alper-Pressman, move that Michael David Mueller be admitted *pro hac vice* to the bar of this Court for the purpose of representing Natural Resource Partners L.P.; WPP LLC; HOD LLC; Independence Land Company, LLC and Williamson Transport LLC (collectively the “NRP” parties) in the instant matter. In support of this motion, I submit the following information as required by Rule 12.01(F):

a. *Full name of the movant-attorney;*

Michael David Mueller, Esquire

1 The Debtors in these cases are each incorporated or organized in the State of Delaware, and along with the last four digits of each Debtor’s federal tax identification number (or SEC filing number if unavailable), are: Foresight Energy LP (8894); Foresight Energy GP LLC (8332); Foresight Energy LLC (7685); Foresight Energy Employee Services Corporation (7023); Foresight Energy Services, LLC (6204); Foresight Receivables LLC (2250); Sugar Camp Energy, LLC (8049); Macoupin Energy LLC (9005); Williamson Energy, LLC (9143); Foresight Coal Sales, LLC (8620); Tanner Energy LLC (0409); Sitran LLC (9962); Seneca Rebuild LLC (0958); Oeneus LLC (6007); Adena Resources, LLC (4649); Hillsboro Transport LLC (6881); American Century Transport LLC (SEC No. 5786); Akin Energy LLC (1648); American Century Mineral LLC (SEC No. 5788); Foresight Energy Finance Corporation (5321); Foresight Energy Labor LLC (4176); Viking Mining LLC (4981); M-Class Mining, LLC (5272); MaRyan Mining LLC (7085); Mach Mining, LLC (4826); Logan Mining LLC (2361); LD Labor Company LLC (8454); Coal Field Repair Services LLC (9179); Coal Field Construction Company LLC (5694); Hillsboro Energy LLC (1639); and Patton Mining LLC (7251). The address of the Debtors’ corporate headquarters is One Metropolitan Square, 211 North Broadway, Suite 2600, St. Louis, MO 63102.

- b. *Address and telephone number of the movant-attorney;*

**Williams Mullen
200 South 10th Street, Suite 1600
Richmond, VA 23219
(804) 420-6000**

- c. *Name of the firm or letterhead under which the movant practices;*

Williams Mullen

- d. *Name of the law school(s) movant attended and the date(s) of graduation therefrom;*

Washington & Lee University School of Law, 1992

- e. *State and federal bars of which the movant is a member, with dates of admission and registration numbers, if any;*

**Virginia State Bar; 1995; Bar No. 38216
Colorado State Bar; 1992; Bar No. 21985 (inactive)
Wisconsin State Bar; 1997; Bar No. 1030329 (inactive)
U.S. District Court for the Eastern District of Virginia; April 9, 1997
U.S. Bankruptcy Court for the Eastern District of Virginia; June 12, 1995
U.S. Bankruptcy Court for the Western District of Virginia; June 12, 1995
U.S. Court of Appeals for the Fourth Circuit; August 20, 1996**

- f. *Statement that movant is a member in good standing of all bars of which movant is a member and that movant is not under suspension or disbarment from any bar;*

I am a member in good standing of the State Bar of Virginia State and no disciplinary actions have ever been filed against me or are currently pending against me.

- g. *Statement that movant does not reside in the Eastern District of Missouri, is not regularly employed in this District, and is not regularly engaged in the practice of law in this District.*

I do not reside in the Eastern District of Missouri and am not employed in the Eastern District of Missouri. I currently reside in the State of Virginia, Eastern District of Virginia.

Movant attests under penalty of perjury to the truth and accuracy of the foregoing facts, and respectfully requests that this motion be granted and that movant be admitted *pro hac vice* to the bar of this Court and be allowed to appear in the instant matter.

Dated: March 11, 2020

Signature of Applicant

/s/ Michael D. Mueller

Respectfully submitted,

LATHROP GPM LLP

/s/ Wendi Alper-Pressman

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**Local Counsel to Natural Resource
Partners L.P. and its affiliates**

CERTIFICATE OF SERVICE

The notice of electronic filing indicates that all necessary parties were served with this document via the Court's CM/ECF System on the 11th day of March, 2020.

/s/ Wendi Alper-Pressman

Wendie Alper-Pressman